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LATHAM & WATKINS LLP

November 2, 2004

By Electronic Filing
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Washington, D.C.

Re: <u>Ex Parte Presentation in Dockets 96-98, 99-68, 01-92, and 04-36</u>

Dear Ms. Dortch:

Cal Simshaw of CenturyTel, Inc. and I met yesterday with Christopher Libertelli, Senior Legal Advisor to Chairman Powell, Aaron Goldberger, on detail from the Wireless Telecommunications Bureau to the Office of Chairman Powell, and the following members of the Wireline Competition Bureau Pricing Policy Division: Tamara Preiss (Division Chief), Victoria Schlesinger, and Steven Morris.

In these meetings CenturyTel urged that the Commission clarify that its compensation rules for ISP-bound traffic were intended to apply only to traffic originating and terminating in the same local calling area (*i.e.*, that of the originating local exchange carrier). CenturyTel described the problems caused by the growing use of "virtual NXX" codes to avoid legitimate assessment of access charges on non-local traffic. CenturyTel requested that any action the Commission may take on inter-carrier compensation be consistent with existing rules authorizing assessment of access charges on non-local traffic. The enclosed materials were provided in the meetings.

In accordance with Commission rules, this letter and the enclosures are being filed in the above-referenced dockets. Please contact me if you have any questions.

Very truly yours,

Karen Brinkmann

Enclosure

cc: Christopher Libertelli, Aaron Goldberger – Office of Chairman Powell
Tamara Preiss, Victoria Schlesinger, Steven Morris – WCB Pricing Policy Division